

July 29, 2002

Ms. Magalle Roman Salas, Secretary
Federal Communication Commission
Office of the Secretary
TW-B204
445 12th Street SW
Washington, D.C. 20554

Re: Docket No. 01-108

Dear Ms. Roman Salas:

This letter is in response to a proposal before the FCC to modify or eliminate rules requiring cellular service providers to maintain analog cellular service (Docket No. 01-108). The Metropolitan Transportation Commission Service Authority for Freeways and Expressways (MTC SAFE) is a local governmental authority responsible for providing motorist-aid services within the nine counties of the San Francisco Bay Area. MTC SAFE currently operates a system of over 3,400 call boxes installed along most of the region's freeways and state highways. The call boxes use analog cellular service (provided by Verizon Wireless) to enable communication between stranded motorists — many of them in extremely hazardous situations — and dispatchers.

Our call box system was initially installed in 1990, and today it provides a lifeline that is used by over 80,000 motorists annually to report incidents and request assistance. As a local agency with limited financial capacity and resources, MTC SAFE must diligently manage its public funds. Any immediate relief provided to cellular companies by the FCC regarding the continued provision of analog cellular service will have a direct and immediate negative impact on the ability of MTC SAFE to reliably operate the call box system.

We estimate that it would cost about \$2 million to modify the call box system with digital technology. We are also concerned with the impact digital technology may have on special add-on devices that are designed to provide call box access to persons with hearing/speech disabilities. MTC SAFE is keenly aware of the requirement of Title II of the Americans With Disabilities Act (ADA) to provide equivalent service to persons with hearing/speech disabilities, and will be investing a sizable amount of funds to ensure compliance. We are concerned about the current compatibility of digital wireless systems with these add-on devices — a concern also voiced by the FCC.

MTC SAFE is not opposed to the desires of the cellular industry to migrate from an analog- to a digital-based cellular system, as it can be recognized that this migration is necessary to create innovation and competition. However, MTC SAFE is requesting that the FCC consider establishing a reasonable transition period to ensure a smooth conversion from an analog-based call box system to a digital system – one that does not cause negative financial, safety and service impacts to the public. Further, MTC SAFE is requesting that the FCC require cellular carriers to work with their customers to develop a reasonable transition plan.

Thank you for the opportunity to inform the FCC of our concerns. Please contact Wes Wells at (510) 817-3220 or Linda Lee at (510) 817-3205 if you should need further information.

Sincerely yours,

Ann Flemer
Deputy Director, Operations

cc: The Honorable Barbara Boxer
The Honorable Diane Feinstein
Bay Area Congressional Delegation
Roger Noel, Deputy Division Chief, Wireless Telecommunications Bureau, FCC
Adnan Basrai, Wireless Telecommunications Bureau, FCC
Linda Chang, Wireless Telecommunications Bureau, FCC
Blaze Scinto, Deputy Division Chief, Policy Division, FCC
D'Wana Perry, Private Wireless & Public Safety Division, FCC